

## CHRISTOPHER MADIOU

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The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan Federal Courthouse  
500 Pearl Street  
New York, NY 10007  
Via ECF

*Sentencing* March 26, 2020  
Conference Adjourned  
From: *May 12, 2020*  
To: *July 24 at 2:15*  
SO ORDERED:  
*[Signature]*  
P. KEVIN CASTEL, U.S.D.J.  
Date: *3-26-20*

Re: *United States v. Jason Galanis*, 15 Cr. 643 (PKC)

Dear Judge Castel,

I represent Jason Galanis in the above-captioned case. I write with consent from the government to request an adjournment of Mr. Galanis' sentencing for at least sixty (60) days. Mr. Galanis is currently scheduled to be sentenced on May 12, 2020 at 11:00am. Mr. Galanis has been incarcerated since May 17, 2016; he is presently housed at the MDC Brooklyn.

This week, we received the draft PSR. As the Court is aware, BOP has shut down legal visitation nationwide because of the COVID-19 pandemic. This poses a unique challenge for counsel in preparing with Mr. Galanis for his sentencing, which is factually and legally complex. Counsel will make every effort to communicate regularly with Mr. Galanis regarding his sentencing, however due to the extremely limited access I currently have with my client, I will be unable to review the PSR with Mr. Galanis nor prepare adequately with him for his sentencing under the current sentencing schedule.

Therefore, I respectfully request that the Court adjourn Mr. Galanis' sentencing for at least sixty (60) days from May 12, 2020 to adequately assure effective assistance of counsel at sentencing. I also respectfully request that Probation's PSR disclosure deadline be similarly adjourned so that Mr. Galanis can have an opportunity to review the PSR, object and supplement the report as may be necessary.

Thank you in advance for your consideration.

Sincerely,



Christopher Madiou

cc: Brian Blais, Assistant United States Attorney (by ECF)  
Tandis Farrence, U.S. Probation Officer (by email)